Inspection #: 2015-P-00221

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513				
Exit Meeting Contact: Dallas Jett  Total Man Days: 4					
Pipeline Safety Representative(s): Valerie Schwing, Matt Smith					
Company Representative to Receive Report: Michael Fuller	Emailed Date:				
Company Representative's Email Address: mfuller2@ameren.com	07/14/2015				

### **Inspection Summary**

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Standard Inspection Other	Jerseyville	Valerie Schwing	Jerseyville/Virden	1	5/12/2015	Dallas Jett
Standard Inspection - Field Audit	Jerseyville	Valerie Schwing, Matt Smith	Jerseyville/Virden	3	5/13/2015, 5/14/2015	Dallas Jett

### **Statement of Activities**

On May 12, 2015, ICC Staff examined old service cards and records to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. The applicable code part included 192.1007(a).

On May 13-14, 2015, ICC Staff conducted a Field Audit to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. During the Field Audit Staff only examined customer meters, cathodic protection, and damage prevention activities. Staff verified during the field audit that 309, 311, 319, and 325 Prairie services were indeed steel risers.

### **Exit Statement**

On May 14, 2014, Staff discussed with the Ameren Illinois personnel, at the operating unit Jerseyville/Virden, the following services that were relocated due to a service replacement project at 309, 311, 313, 319, 323, and 325 Prairie Street in Jerseyville. The services were coated steel that were directly connected to a coated steel main. Due to the sewer replacement project that was conducted in 1997, Ameren was required to relocate a portion of the service line. The Ameren field personnel removed a section of the steel service line and installed ½" PE along with a tracer wire that was connected to each end of the steel service. This installation practice made the above mentioned services to be considered isolated. Ameren failed to document in its recordkeeping system the services as isolated, but did document the removed sections of the steel service lines and installation of ½" PE on the Gas Service Record Cards. Ameren Illinois informed Staff of this discovery on April 30, 2015.

Ameren Illinois informed Staff that the services at 201 East Pearl, 721 S. State, 1313 Glenda, 1205 S. State, 708 E. Prairie Street, 1409 Sumner in Jerseyville, and the Trans line in Wrights, IL, may contain isolated sections of steel pipelines due to the dates of installation and/or repair methods used at that time. Ameren Illinois personnel informed Staff that the services in question will be exposed to determine if the services do contain isolated sections of steel pipe. Ameren Illinois is required to provide Staff by July 15, 2015, a summary of the updated actions for the listed services.

Ameren Illinois will also be required to requalify the individuals associated with the service replacement project that was conducted in 1997. The requalification will be primarily over properly identifying and documenting isolated steel sections. Ameren Illinois is required to provide Staff by July 15, 2015, a summary of the requalifications for the individuals.

At this time Staff will be reviewing the Ameren Illinois Distribution Integrity Management Plan to determine if a Notice of Probable Violation will be issued due to Ameren Illinois personnel not demonstrating an understanding of its gas distribution system developed from reasonably available information.

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### INSPECTION FINDINGS

### **Standard Inspection - Field Audit**

### Issues(s) Found:

**2015-S001-00029** (Code Part [192.357(a)]) - On May 13, 2015, Staff discovered a buried meter at 309 Prairie Street, Jerseyville, IL. In order for this issue to be closed the meter must be raised in order to minimize anticipated stresses upon the connecting piping and the meter.

**2015-S002-00029** (Code Part [192.357(a)]) - On May 13, 2015, Staff discovered a buried meter at 325 Prairie Street, Jerseyville, IL. In order for this issue to be closed the meter must be raised in order to minimize anticipated stresses upon the connecting piping and the meter.

### Notice Of Amendment(s) Found:

[NO NOAS FOUND]

### Notice Of Violation(s) Found:

[NO NOPVS FOUND]

## **Standard Inspection Other**

## Issues(s) Found:

[NO ISSUES FOUND]

## Notice Of Amendment(s) Found:

[NO NOAS FOUND]

### Notice Of Violation(s) Found:

2015-V001-00004 (Code Part [192.1005][192.1007(a)]) - Staff was informed that the gas service at 309 Prairie Street, Jerseyville, was recently discovered as an isolated service. Ameren Illinois had failed to inspect or document this location as an isolated service since installation on September 26, 1997, until April 30, 2015. This failure to properly identify the isolated service in the recordkeeping system, clearly indicates that Ameren Illinois did not demonstrate an understanding of its gas distribution system by reviewing the gas service record, which is a document that is reasonably available to Ameren personnel. Reasonably available information includes gas service records as described in the Ameren Illinois DIMP in Section II Knowledge of Facilities Part B. Type and Location of Records 2. Records Utilized e. Pipe and System Attribute Data and the utilization of Subject Matter resources in Section II Knowledge of Facilities Part B. Type and Location of Records 4. Acquiring Additional Information. It has been clearly identified by Staff that Ameren Illinois does not have an adequate knowledge of the attributes within its system. Ameren is required to inspect all reasonably available information to properly populate the Ameren DIMP. Once a review has been completed, then the findings must be forwarded to Staff. If Staff determines the review was adequate, then the violations will be corrected.

**2015-V002-00004** (Code Part [192.1005][192.1007(a)]) - Staff was informed that the gas service at 311 Prairie Street, Jerseyville, was recently discovered as an isolated service. Ameren Illinois had failed to inspect or document this location as an isolated service since installation on September 26, 1997, until April 30, 2015. This failure to properly identify the isolated

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service in the recordkeeping system, clearly indicates that Ameren Illinois did not demonstrate an understanding of its gas distribution system by reviewing the gas service record, which is a document that is reasonably available to Ameren Illinois personnel. Reasonably available information includes gas service records as described in the Ameren Illinois DIMP in Section II Knowledge of Facilities Part B. Type and Location of Records 2. Records Utilized e. Pipe and System Attribute Data and the utilization of Subject Matter resources in Section II Knowledge of Facilities Part B. Type and Location of Records 4. Acquiring Additional Information. It has been clearly identified by Staff that Ameren Illinois does not have an adequate knowledge of the attributes within its system. Ameren is required to inspect all reasonably available information to properly populate the Ameren DIMP. Once a review has been completed, then the findings must be forwarded to Staff. If Staff determines the review was adequate, then the violations will be corrected.

2015-V003-00004 (Code Part [192.1005][192.1007(a)]) - Staff was informed that the gas service at 319 Prairie Street, Jerseyville, was recently discovered as an isolated service. Ameren Illinois had failed to inspect or document this location as an isolated service since installation on September 26, 1997, until April 30, 2015. This failure to properly identify the isolated service in the recordkeeping system, clearly indicates that Ameren Illinois did not demonstrate an understanding of its gas distribution system by reviewing the gas service record, which is a document that is reasonably available to Ameren Illinois personnel. Reasonably available information includes gas service records as described in the Ameren Illinois DIMP in Section II Knowledge of Facilities Part B. Type and Location of Records 2. Records Utilized e. Pipe and System Attribute Data and the utilization of Subject Matter resources in Section II Knowledge of Facilities Part B. Type and Location of Records 4. Acquiring Additional Information. It has been clearly identified by Staff that Ameren Illinois does not have an adequate knowledge of the attributes within its system. Ameren is required to inspect all reasonably available information to properly populate the Ameren DIMP. Once a review has been completed, then the findings must be forwarded to Staff. If Staff determines the review was adequate, then the violations will be corrected.

2015-V004-00004 (Code Part [192.1005][192.1007(a)]) - Staff was informed that the gas service at 325 Prairie Street, Jerseyville, was recently discovered as an isolated service. Ameren Illinois had failed to inspect or document this location as an isolated service since installation on September 26, 1997, until April 30, 2015. This failure to properly identify the isolated service in the recordkeeping system, clearly indicates that Ameren Illinois did not demonstrate an understanding of its gas distribution system by reviewing the gas service record, which is a document that is reasonably available to Ameren Illinois personnel. Reasonably available information includes gas service records as described in the Ameren Illinois DIMP in Section II Knowledge of Facilities Part B. Type and Location of Records 2. Records Utilized e. Pipe and System Attribute Data and the utilization of Subject Matter resources in Section II Knowledge of Facilities Part B. Type and Location of Records 4. Acquiring Additional Information. It has been clearly identified by Staff that Ameren Illinois does not have an adequate knowledge of the attributes within its system. Ameren is required to inspect all reasonably available information to properly populate the Ameren DIMP. Once a review has been completed, then the findings must be forwarded to Staff. If Staff determines the review was adequate, then the violations will be corrected.

### PAST INSPECTION FINDINGS

Issue(s) Corrected:

[NO ISSUES CORRECTED]

Notice Of Amendment(s) Corrected:

[NO NOAS CORRECTED]

Notice of Violations(s) Corrected:

[NO NOPVS CORRECTED]

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